

Roscoe C. Nelson, Jr., OSB No. 732218

Email: attorneys@roscoenelson.com

MoNelson & Nelson

811 SW Naito Parkway, Suite 200

Portland, Oregon 97204

Telephone: 503.222.1081

Of Attorneys for Plaintiff NW Metals, Inc.

Moyata Anotta

3744 NW Devoto Ln.

Portland OR 97229

503-367-6955

anottam@gmail.com

Pro Se

Ellen F. Rosenblum

Attorney General

James S. Smith, OSB No. 840932

Email: james.s.smith@doj.state.or.us

Senior Assistant Attorney General

Department of Justice

100 SW Market Street

Portland, OR 97201

Telephone: 971.673.1880

Of Attorneys for Defendants

UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

MOTION FOR SUMMARY JUDGMENT

MOYATA ANOTTA, an individual; and
 NW METALS, INC., an Oregon corporation,

Plaintiffs,

v.

OREGON DEPARTMENT OF
 ENVIRONMENTAL QUALITY, an Oregon
 governmental regulatory agency; RICHARD
 WHITMAN, an individual; LEAH FELDON, an
 individual; NINA DECONCINI, an individual;
 DEREK SANDOZ, an individual; COURTNEY
 BROWN, an individual; and STEVEN
 DIETRICH, an individual,

Defendants.

Case No. 3:22-cv-00953-YY

MOTION FOR SUMMARY JUDGMENT

PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

Plaintiffs' Moyata Anotta and NW Metals hereby moves for summary judgment pursuant to Fed. R. Civ. P. 56. As demonstrated in the attached Memorandum in support of this motion , there is no genuine dispute as to material facts that render Defendants OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY, an Oregon governmental regulatory agency; RICHARD WHITMAN, an individual; LEAH FELDON, an individual; NINA DECONCINI, an individual; DEREK SANDOZ, an individual; COURTNEY BROWN, an individual; and STEVEN DIETRICH, an individual, liable to Plaintiffs. Therefore, for the reasons stated herein and in the accompanying Plaintiffs' Memorandum Supporting Their Motion for Summary Judgment, Plaintiffs' Statement of Undisputed Facts, and Exhibits, Plaintiff's motion for summary judgment should be granted

Dated: July 5th 2024.

MOTION FOR SUMMARY JUDGMENT

NELSON & NELSON

/s/Roscoe Nelson

Roscoe C. Nelson, Jr., OSB No. 732218

Email: attorneys@roscoenelson.com

Telephone: 503.222.1081

Of Attorneys for Plaintiff NW Metals, Inc.

/s/Moyata Anotta

Moyata Anotta

Pro Se Plaintiff

MOTION FOR SUMMARY JUDGMENT